

## E-Rate Documentation Retention Rules to Live By



# Training Topics

E-RATE



1. Documentation Rule by FCC
2. Where to keep
3. Paper vs Digital
4. Rebecca's Demo

### Recordkeeping requirements

**(1) Schools, libraries, and consortia.** Schools, libraries, and any consortium that includes schools or libraries shall retain all documents related to the application for, receipt, and delivery of supported services **for at least 10 years** after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request. Any other document that demonstrates compliance with the statutory or regulatory requirements for the schools and libraries mechanism shall be retained as well. Schools, libraries, and consortia shall maintain asset and inventory records of equipment purchased as components of supported category two services sufficient to verify the actual location of such equipment for a period of 10 years after purchase.

## § 54.516

(b) **Production of records.** Schools, libraries, consortia, and service providers shall produce such records at the request of any representative (including any auditor) appointed by a state education department, the Administrator, the FCC, or any local, state or federal agency with jurisdiction over the entity.

# FCC 47 CFR § 54.516

E-RATE

(c) **Audits.** Schools, libraries, consortia, and service providers shall be subject to audits and other investigations to evaluate their compliance with the statutory and regulatory requirements for the schools and libraries universal service support mechanism, including those requirements pertaining to what services and products are purchased, what services and products are delivered, and how services and products are being used. Schools, libraries, and consortia receiving discounted services must provide consent before a service provider releases confidential information to the auditor, reviewer, or other representative.



# FCC 47 CFR § 54.516

## E-RATE

(d) **Inspections.** Schools, libraries, consortia and service providers shall permit any representative (including any auditor) appointed by a state education department, the Administrator, the Commission or any local, state or federal agency with jurisdiction over the entity to enter their premises to conduct E-rate compliance inspections.



# Maintain Records for at least 10 years!

# E-RATE

E-rate rules require the retention of documents for a minimum of ten years beyond the last date to receive service. Since this “last date” is well after the start of the procurement and application cycles, documents on this aspect of E-rate must actually be retained for TWELVE (12) years or more!

As a practical rule of thumb:



**DO NOT DISCARD ANY E-RATE MATERIAL – EVER!!!**

# Furthermore...

## E-RATE

The retention requirements are quite detailed, going well beyond simply keeping copies of E-rate forms. Failure to produce these records can lead, and already has led, to formal actions to recover E-rate funds.

Documentation is required for:

- Discount rate calculations
- CIPA Compliance
- RFPs
- Records of winning and losing bids
- Inventories including packing lists, receipts





# Where to Keep

## E-RATE



Most all E-rate form documents are electronic/digital. As of FY 2016, all EPC users are identified by unique email addresses and passwords.



Electronic records for E-rate should be accessible to all school or library administration including finance and technology personnel. Work with the technology director or manager to ensure the files are accessible yet secure.

# Paper versus Digital

E-RATE

Prior to the implementation of the E-rate Productivity Center (EPC), many records were routinely kept in physical binders. E-rate documents were printed by USAC on colored papers.

Today, digital /electronic records are recognized as authentic copies by the E-rate program.

A combination of both types of records meet record retention requirements.

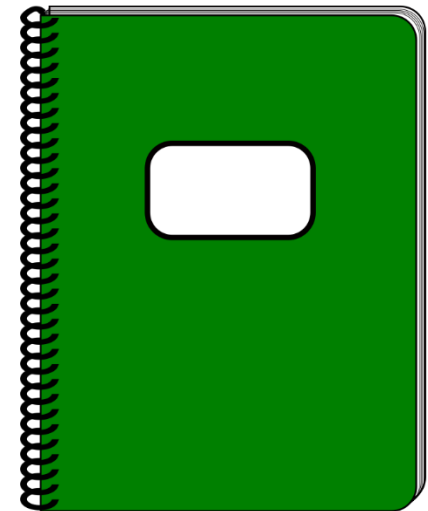


# Paper versus Digital

E-RATE

An “Evergreen Binder” is suggested as a physical way to store the information that does not change, or is frequently accessed. Examples:

- Proof of eligibility
- IRS not-for-profit determination letter
- BEN numbers
- CIPA Compliance documents – board minutes



# How to organize data

E-RATE

By funding year (FY)

Within FY - Actions

Pre-bidding

Bidding

Contracts

Application process

Invoices/payments

Purchase, delivery & inventory of service

Forms

Compliance

Miscellaneous

ALL FUNDING YEARS / FY 2020



# Digital Records Organization

E-RATE

## Pre-bidding examples:

- Letters of Agency
- Consultant Agreements
- Technology Plans

## Bidding examples:

- RFP
- Evidence of publication date
- Bid evaluation criteria and weighting
- All correspondence with vendors
- All bids submitted (winning and losing)
- Vendor selection documents



# Digital Records Organization

E-RATE

## Contracts Examples:

- Contracts
- Addendums



## Application Process Examples:

- Technology Budget
- Entity Address Validations
- NSLP data
- Enrollment data
- Copies of bills for month-to-month services
- Estimated Category 2 budgets
- Item 21 Attachments
- PIA Review Documents

# Free Software Available

# E-RATE

ErateDocX.com provides FREE software for schools and libraries to organize and retain documentation

The screenshot shows the ErateDocX.com web application interface. At the top, there is a dark blue navigation bar with the ErateDocX logo on the left and links for 'Best Practices', 'Helpful Links', and 'Rebecca Martin' on the right. Below this is an orange banner with the text 'Enjoying ErateDocX?' and a 'Refer a Friend' button. A secondary navigation bar contains buttons for 'Funding Years', 'Manage Users', 'Upload Files', 'Documents Reports', and 'Restore Files'. The main content area is titled 'ALL FUNDING YEARS' and features a '+ Add New Funding Year' button. Two funding year cards are displayed: 'FY 2020' and 'FY 2019'. Each card has a 'See details' link and a 'Download' button. To the right, a 'SEARCH' sidebar includes a search input field, a 'Filter search by' section with dropdowns for 'Funding Year' (set to 'All Funding Years') and 'Category' (set to 'All Categories'), and a 'Search' button.

# Wrapping it up

E-RATE

Keep everything!

Organize the filing system



Make it sharable yet secure



# Q&A



# Resources

E-RATE

- NC E-rate Website: <https://erate.fi.ncsu.edu/>
- [2021 E-rate Handbook](#)
- [Usac.org/e-rate](https://usac.org/e-rate)
- Rebecca, Roxie and Mike!

Content courtesy of Universal Administrative Company, [usac.org](https://usac.org).

